

# MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ  
RICHARD F. ALBERT  
ROBERT J. ANELLO\*  
BENJAMIN S. FISCHER  
CATHERINE M. FOTI  
CHRISTOPHER B. HARWOOD  
LAWRENCE IASON  
BRIAN A. JACOBS  
TELEMACHUS P. KASULIS  
ROBERT M. RADICK\*  
JONATHAN S. SACK\*\*  
EDWARD M. SPIRO  
JEREMY H. TEMKIN  
RICHARD D. WEINBERG

565 FIFTH AVENUE  
NEW YORK, NEW YORK 10017  
(212) 856-9600  
FAX: (212) 856-9494

[www.maglaw.com](http://www.maglaw.com)

## WRITER'S CONTACT INFORMATION

charwood@maglaw.com  
(212) 880-9547

SENIOR COUNSEL  
PAUL R. GRAND

—

COUNSEL

JASMINE JUTEAU  
CURTIS B. LEITNER

JACOB W. MERMELSTEIN

BRENT M. TUNIS

—  
ROBERT G. MORVILLO  
1938-2011

MICHAEL C. SILBERBERG  
1940-2002

JOHN J. TIGUE, JR.  
1939-2009

\* ALSO ADMITTED IN WASHINGTON, D.C.

\*\* ALSO ADMITTED IN CONNECTICUT

December 9, 2020

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 1/15/2021

## BY ECF

Honorable Mary Kay Vyskocil

Re: Clarkson Recovery Corp. v. Ryzinski & Macniak, 20 Civ. 4336 (MKV)

Dear Judge Vyskocil:

We represent plaintiff/counterclaim-defendant Clarkson Recovery Corp. (“plaintiff”) in the referenced matter. In accordance with the Court’s Individual Rules, we write respectfully on behalf of both plaintiff and defendants/counterclaim-plaintiffs Bolek Ryzinski and Lukas Macniak to request a 45-day extension of the deadline for the completion of fact discovery in this action (from January 18, 2021 to March 4, 2021), and a corresponding adjustment of the remaining dates in the Civil Case Management Plan and Scheduling Order (Dkt. 20). A proposed revised Civil Case Management Plan and Scheduling Order (extending all remaining deadlines by 45 days) is being submitted with this letter. This is the parties’ first request for an extension of the discovery deadlines.

The parties have been working diligently with respect to discovery, including (i) serving and responding to written discovery, (ii) meeting and conferring on their respective responses to the written discovery, (iii) collecting documents from their respective clients, and (iv) meeting and conferring with respect to search terms to apply to electronic documents they have collected. Although some areas of potential dispute have arisen, the parties have been attempting in good faith to work through them, and will promptly raise with the Court any issues they are unable to resolve. The parties anticipate substantially completing their document productions by late December or early January, but anticipate needing additional time to review each other’s productions, discuss any issues that may arise or follow up that may be needed based on the productions, and then conduct deposition discovery. Accordingly, the parties respectfully request that the Court grant the 45-day extension of the discovery deadlines requested herein.

Thank you for considering this request.

Respectfully submitted,

/s/ Christopher B. Harwood

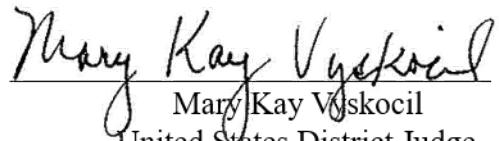
Christopher B. Harwood

Genevieve Hanft

cc: Defendants' counsel (by ECF)

**Granted. SO ORDERED.**

Date: January 15, 2021  
New York, New York

  
Mary Kay Viskocil  
United States District Judge